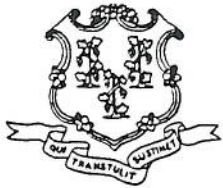




DIVISION SUPERIOR TECHNOLOGY
LACEY PLACE • SOUTHPORT, CT 06490 • 203-255-1501
FAX: 203-254-3618

RICHARD DURAZZO



STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION



August 14, 1998

Mr. Charles Szaley
Plant Manager
Superior Plating Co
2 Lacey Place
Southport, CT 06490

Re: Order No. 1540

Dear Mr. Szaley:

On January 16, 1998, the Bureau of Air Management of the Department of Environmental Protection (DEP) issued Notice of Violation No. 13618 to you for exceeding the Maximum Allowable Stack Concentration (MASC) for chromium as stipulated in 22a-174-29(b)(1) of the Regulations of Connecticut State Agencies (R.C.S.A.). The chromium emissions are from 21 chromium electroplating tanks operated at 2 Lacey Place, in Southport.

Due to the serious nature of the violation, DEP seeks resolution of this matter through the issuance of an Order. Please find the enclosed certified copy of Order No. 1540 which requires that Superior Plating Co. cease operation of the 21 chromium electroplating tanks at the facility located at 2 Lacey Place, Southport, Connecticut. The enclosed Order also specifies the violation and the steps that must be taken to achieve compliance with the cited regulations.

If you wish to dispute the issuance or the terms of Order No. 1540, you may, within thirty (30) days of your receipt of this Order, file a written appeal with the Office of Adjudications and request a hearing pursuant to Section 22a-3a-6(i) of R.C.S.A.

If you have any questions regarding this letter or the attached Order No. 1540, or if you wish to schedule a meeting to discuss the terms of this case, please contact Mr. Robert LaFrance of the Bureau of Air Management at (860) 424-3401.

Sincerely,

Carmine DiBattista
Bureau Chief
Bureau of Air Management

Enclosure

Certified Document No.

276 817 359

GASUPERIOR/ORDERCOV.WPD

(Printed on Recycled Paper)

79 Elm Street • Hartford, CT 06106 - 5127

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An Equal Opportunity Employer



STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION



STATE OF CONNECTICUT

ORDER NO. 1540

VS.

SUPERIOR PLATING CO.

ORDER

A. The Commissioner of Environmental Protection (Commissioner) finds the following:

1. Superior Plating Co. (Respondent) is a corporation which engages in chromium electroplating and is operating at 2 Lacey Place, Southport, Connecticut (facility).
2. At the facility, Respondent operates twenty-one (21) chromium electroplating tanks. Respondent currently utilizes two fiber bed demisters to control emissions from these chromium electroplating tanks.
3. On August 29, 1997, chromium emission stack tests were performed at the facility. These tests were performed on two exhaust stacks that serve the twenty-one electroplating tanks and the two fiber bed demisters. An employee of the Department of Environmental Protection was present at these tests.
4. On December 1, 1997, the Respondent submitted to the Department, in writing, the results of the chromium emission stack tests performed on August 29, 1997.
5. The Commissioner has determined, based upon Respondent's stack test results, that chromium emissions from the facility exceed allowable emission standards. Such exceedances represent a potential threat to human health and the environment.
6. By virtue of the above, Respondent has violated the Regulations of Connecticut State Agencies (R.C.S.A.) Section 22a-174-29.

B. The Commissioner, pursuant to Sections 22a-6, 22a-171, 22a-174, 22a-177, and 22a-178 of the Connecticut General Statutes, orders as follows:

1. Respondent shall immediately cease operating the twenty-one chromium electroplating tanks and shall not resume operations until the Commissioner determines in writing that compliance with all applicable emission limitations stipulated in Section 22a-174-29 of R.C.S.A. and this order are achieved.
2. Respondent shall submit an Intent to Test (ITT) protocol for testing of the chromium emission control system to the Commissioner for his review and written approval.

3. Upon approval of the ITT, Respondent may commence operation of the twenty-one chromium electroplating tanks with the emission control system for testing purposes provided that no later than thirty days prior to commencing operation of said equipment Respondent shall notify the Commissioner, in writing, of the date of such commencement.
4. Progress Reports. On or before the tenth day of every month following issuance of this order, and continuing until all actions required by this order have been completed as approved, Respondent shall submit a progress report to the Commissioner describing the actions which Respondent has taken to comply with this order to date.
5. Full compliance. Respondent shall not be considered in full compliance with this order until all actions required by this order have been completed as approved and to the satisfaction of the Commissioner.
6. Approvals. Respondent shall use best efforts to submit to the Commissioner all documents required by this order in a complete and approvable form. If the Commissioner notifies Respondent that any document or other action is deficient, and does not approve it with conditions or modifications, it is deemed disapproved, and Respondent shall correct the deficiencies and resubmit it within the time specified by the Commissioner or, if no time is specified by the Commissioner, within thirty (30) days of the Commissioner's notice of deficiencies. In approving any document or other action under this order, the Commissioner may approve the document or other action as submitted or performed or with such conditions or modifications as the Commissioner deems necessary to carry out the purposes of this order. Nothing in this paragraph shall excuse noncompliance or delay.
7. Definitions. As used in this order, "Commissioner" means the Commissioner or an agent of the Commissioner.
8. Dates. The date of submission to the Commissioner of any document required by this order shall be the date such document is received by the Commissioner. The date of any notice by the Commissioner under this order, including but not limited to notice of approval or disapproval of any document or other action, shall be the date such notice is personally delivered or the date three (3) days after it is mailed by the Commissioner, whichever is earlier. Except as otherwise specified in this order, the word "day" as used in this order means calendar day. Any document or action which is required by this order to be submitted or performed by a date which falls on a Saturday, Sunday or a Connecticut or federal holiday shall be submitted or performed on or before the next day which is not a Saturday, Sunday or Connecticut or federal holiday.
9. Notification of noncompliance. In the event that Respondent becomes aware that it did not or may not comply, or did not or may not comply on time, with any requirement of this order or of any document required hereunder, Respondent shall immediately notify the Commissioner and shall take all reasonable steps to ensure that any noncompliance or delay is avoided or, if unavoidable, is minimized to the greatest extent possible. In so notifying the Commissioner, Respondent shall state in writing the reasons for the noncompliance or delay and propose, for the review and written

approval of the Commissioner, dates by which compliance will be achieved, and Respondent shall comply with any dates which may be approved in writing by the Commissioner. Notification by Respondent shall not excuse noncompliance or delay, and the Commissioner's approval of any compliance dates proposed shall not excuse noncompliance or delay unless specifically so stated by the Commissioner in writing.

10. Certification of documents. Any document, including but not limited to any notice, which is required to be submitted to the Commissioner under this order shall be signed by the chief executive officer of Respondent or a duly authorized representative of such officer, as those terms are defined in Section 22a-430-3(b)(2) of the Regulations of Connecticut State Agencies, and by the individual or individuals responsible for actually preparing such document, each of whom shall examine and be familiar with the information submitted in the document and all attachments thereto, and shall make inquiry of those individuals responsible for obtaining the information to determine that the information is true, accurate, and complete, and each of whom shall certify in writing as follows:

"I have personally examined and am familiar with the information submitted in this document and all attachments thereto, and I certify that based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information, the submitted information is true, accurate and complete to the best of my knowledge and belief. I understand that any false statement made in the submitted information may be punishable as a criminal offense under Section 22a-175 of the Connecticut General Statutes or, in accordance with Section 22a-6 of the Connecticut General Statutes, under Section 53a-157b of the Connecticut General Statutes, and in accordance with any other applicable statute."
11. False statements. Any false statement in any information submitted pursuant to this order may be punishable as a criminal offense under Section 22a-175 of the Connecticut General Statutes or, in accordance with Section 22a-6, under Section 53a-157b of the Connecticut General Statutes.
12. Notice of transfer; liability of Respondent and others. Until Respondent has fully complied with this order, Respondent shall notify the Commissioner in writing no later than fifteen (15) days after transferring all or any portion of the facility, the operations, the site or the business which are the subject of this order, or obtaining a new mailing or location address. Any licence transfer shall be conducted in accordance with Section 22a-60 of the Connecticut General Statutes. Respondent's obligations under this order shall not be affected by the passage of title to any property to any other person or municipality. Any future owner of the site may be subject to the issuance of an order from the Commissioner.
13. Commissioner's powers. Nothing in this order shall affect the Commissioner's authority to institute any proceeding or take any other action to prevent or abate violations of law, prevent or abate pollution, recover costs and natural resource damages, and to impose penalties for violations of law which have not been specifically provided in this order, including but not limited to violations of any permit issued by the Commissioner. If at any time the Commissioner determines that the actions taken by Respondent pursuant to this order have not fully characterized the extent and degree of

pollution or have not successfully abated or prevented pollution, the Commissioner may institute any proceeding to require Respondent to undertake further investigation or further action to prevent or abate pollution.

14. Respondent's obligations under law. Nothing in this order shall relieve Respondent of other obligations under applicable federal, state and local law.
15. No assurance by Commissioner. No provision of this order and no action or inaction by the Commissioner shall be construed to constitute an assurance by the Commissioner that the actions taken by Respondent pursuant to this order will result in compliance or prevent or abate pollution.
16. No effect on rights of other persons. This order shall neither create nor affect any rights of persons who or municipalities which are not parties to this order.
17. Notice to Commissioner of changes. Within fifteen (15) days of the date Respondent becomes aware of a change in any information submitted to the Commissioner under this order, or that any such information was inaccurate or misleading or that any relevant information was omitted, Respondent shall submit the correct or omitted information to the Commissioner.
18. Submission of documents. Any document required to be submitted to the Commissioner under this order shall, unless otherwise specified in writing by the Commissioner, be directed to:

Mr. Matthew J. Hemming
Department of Environmental Protection
Bureau of Air Management
Engineering and Enforcement Division
79 Elm Street
Hartford, Connecticut 06106-5127

Issued as an order of the Commissioner of Environmental Protection on

August 10, 1998

Arthur J. Rocque, Jr.
Commissioner

CITY OF SOUTHPORT
LAND RECORDS
MAILED CERTIFIED MAIL,
RETURN RECEIPT REQUESTED
Certified Document No. 276 817 360

AJR/MJH

Steve/Fred: I'll be talking to Mike Vavering in 2 weeks
let me know if you've dismanned w/ DEP
VI 8/17/98
R 8/17



STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION
enforcement status + any Q's you want me to ask. to Arnie



STATE OF CONNECTICUT

ORDER NO. 1540

VS.

SUPERIOR PLATING CO.

ORDER

- A. The Commissioner of Environmental Protection (Commissioner) finds the following:
1. Superior Plating Co. (Respondent) is a corporation which engages in chromium electroplating and is operating at 2 Lacey Place, Southport, Connecticut (facility).
 2. At the facility, Respondent operates twenty-one (21) chromium electroplating tanks. Respondent currently utilizes two fiber bed demisters to control emissions from these chromium electroplating tanks.
 3. On August 29, 1997, chromium emission stack tests were performed at the facility. These tests were performed on two exhaust stacks that serve the twenty-one electroplating tanks and the two fiber bed demisters. An employee of the Department of Environmental Protection was present at these tests.
 4. On December 1, 1997, the Respondent submitted to the Department, in writing, the results of the chromium emission stack tests performed on August 29, 1997.
 5. The Commissioner has determined, based upon Respondent's stack test results, that chromium emissions from the facility exceed allowable emission standards. Such exceedances represent a potential threat to human health and the environment.
 6. By virtue of the above, Respondent has violated the Regulations of Connecticut State Agencies (R.C.S.A.) Section 22a-174-29.
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- * 1. Respondent shall immediately cease operating the twenty-one chromium electroplating tanks and shall not resume operations until the Commissioner determines in writing that compliance with all applicable emission limitations stipulated in Section 22a-174-29 of R.C.S.A. and this order are achieved.
 - * 2. Respondent shall submit an Intent to Test (ITT) protocol for testing of the chromium emission control system to the Commissioner for his review and written approval.

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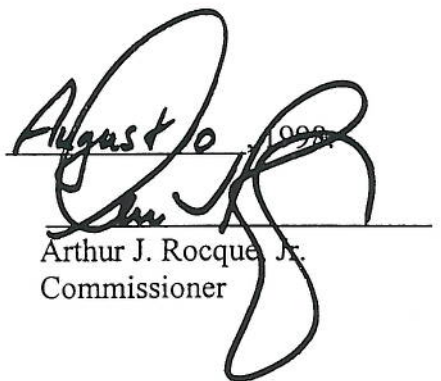
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Mr. Matthew J. Hemming
Department of Environmental Protection
Bureau of Air Management
Engineering and Enforcement Division
79 Elm Street
Hartford, Connecticut 06106-5127

Issued as an order of the Commissioner of Environmental Protection on

August 10, 1998

Arthur J. Rocque, Jr.
Commissioner

CITY OF SOUTHPORT
LAND RECORDS
MAILED CERTIFIED MAIL,
RETURN RECEIPT REQUESTED
Certified Document No. _____

AJR/MJH

LOG NUMBER(S): 96-0156 <i>ju</i>
DOCUMENT NAME: 6SUPEROR.P&N
SOURCE: SUPERIOR PLATING COMPANY
ADDRESS: LACEY PLACE, SOUTHPORT, 203-255-1501
DATE(S) INSPECTED: 3-6-96
ENGINEER'S NUMBER: 184

INSPECTION REPORT

Superior Plating (SP) does high quality Chrome, EN and Nickel plating. SP has been in operation since 1956 and employs 63 people. SP operates 24 hours a day, five days a week and half day on Saturday for 50 weeks per year. Mr. Richard Durazzo, Environmental Manager was my company escort.

Chrome plating is currently performed on the inside of gun barrels. This particular operation is a closed loop process in which the plating solution is pumped through the barrels and returned to the plating tanks.

Miscellaneous parts of various sizes are also chrome plated for food processing, aerospace and other industries. The make-up of these chrome plating tanks are a standard 250 g/l chromic acid, 2.5 g/l sulfuric acid (100 to 1 ratio). Operating current density range is 2-5 ASI.

There are nineteen (19) chrome plating tanks, five (5) of which exceed 1,000 gallons capacity and are registered (P-19, P-23, P-24, P-37, P-60). Three (3) other chrome tanks are not being used but are also registered (P-61, P-62, P-63).

Except for the gun barrels, plating is done in open tanks. There are two (2) ventilation systems for controlling the emissions from the plating tanks. Hoods surround (front and back) each tank and is duct to the main headers located under the floor of the plating shop. Each duct also has drains to allow drainage of each hood. Each exhaust system has a demister and no visible emissions were observed. Mr. Durazzo stated that SP plans to preform stack testing on both of the chrome exhaust systems. The stack testing is planed for mid-summer of 1996.

In determining the actual emission rates for the toxic addendum, the source did in-house sampling using isokinetic sampling methods and collecting samples at the demister exhaust. Actual stack concentrations are 0.00001 lbs/hr of Hex-chrome and the allowed rate is 0.0003344lbs/hr. Mr. Durazzo did not know how long ago this data was generated.

Samples were analyzed using a spectrophotometer with a lower detection limit of 0.01 ppm with the sampling equipment used. This detection limit is equivalent to 0.0009 mg/m³ of Hex-chrome for an 8 hour run.

Waste water containing Hex-chrome is reduced to Tri-chrome by rising the pH to 3-3.5 and adding sodium metabisulfite. All process waste water is treated for metals and pH adjusted. The process water is discharged to the local POTW. This waste water process is a batch process and its flow rate is between 3,000 and 6,000 gallons per day. SP is also treating ground water. This ground water has 100 ppm of chrome. This process is located behind the main plant and is exhausted. No visible emissions or odors were noticed.

There were two (2) 400 gallons Electroless Nickel (EN) tanks, Mr. Durazzo explained that SP plans to install two (2) more 400 gallon EN tanks this year to help with production. There is one (1) 750 gallons and one (1) 250 gallons electrolytic nickel tanks and one (1) 100 gallons Woods nickel strike tank. The company currently uses a water based cleaner, CEE-BEE 7x7.

This company has the potential of 10 tons of Chrome (HAP) emission that will cause this source to be a title 5 source. Mr. Durazzo is planning to contact the DEP to apply for a general permit.

The registered (R-66) Johnson boiler (125 hp) was converted in the fall of 1989 to burn natural gas only. The gas burner is rated at 252,000 CFH and is the main boiler supplying steam to the plant. The Burnham boiler (40 hp) also burns natural gas and is the backup unit. The natural gas fuel consumption for the year 1996 was 129,500 ccf (0.91 tons of Nox).

RECOMMENDATIONS:

Reinspect in 2-3 years and after title 5 permitting.

Lou Santos: 

Date: 3-6-96

STATE OF CONNECTICUT

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BUREAU OF AIR MANAGEMENT TEL: (860) 424-3028

PRE-INSPECTION QUESTIONNAIRE

DECEMBER 28, 1995

PAGE 1 OF 20

FOR OFFICE USE ONLY:

FISCAL YEAR: 94

LAST INSPECTOR: 141 EPA CLASS: A2 EPA PROGRAM CODE:

LAST INSPECTION: 12/08/93 FUEL SAMPLE TAKEN: UPDATE: 12/07/95

CLIENT: 703 SEQUENCE: 1 TOWN: 61 PREMISE: 23

(1.) GENERAL INFORMATION:

COMPANY NAME: SUPERIOR PLATING CO

MAIL ADDRESS: LACEY PLACE, SOUTHPORT, CT 06490

SITE ADDRESS: LACEY PLACE, SOUTHPORT

COMPANY CONTACT: Richard Durazzo
CHARLES SZALEY TITLE: CHEMIST Environmental Manager

LOCAL CONTACT: WES THOMPSON Warren Montgomery

TELEPHONE: (203) 255-1501 EXT: FAX: (203) 254-3618

NATURE OF OPERATION: CHROME & NICKEL PLTG SIC CODE: 3471

CORPORATE NAME: SUPERIOR TECHNOLOGY DATE OWNED: 01/01/56

CORPORATE ADDRESS: LACEY PLACE, SOUTHPORT, CT,

IS DATA CONFIDENTIAL? (Y/N): N YEAR OF DATA: ~~1992~~ 1995

HAS ANY EQUIPMENT BEEN (OR IN PROCESS OF BEING) CONSTRUCTED, INSTALLED, OR MODIFIED SINCE FEB 1, 1989? (Y/N): N

NUMBER OF EMPLOYEES AT THIS LOCATION?: 63

I HAVE READ AND VERIFIED THAT THE ATTACHED DATA IS CORRECT:

SIGNED: Richard Durazzo DATE: 1-31-96

COMPANY NAME: SUPERIOR PLATING CO(2.) ON-SITE PROCESS TYPES (CHECK ALL THAT APPLY):☐ INCINERATOR☒ DEGREASER (NO. OF EACH): VAPOR- ☐ COLD- 0 CONVEYORIZED- ☐☐ FLARES ☐ SURFACE COATING ☒ LIQUID STORAGE TANK ☐ NONE(3A.) GROUP I CHEMICALS USED ON-SITE (CHECK ALL THAT APPLY):

<input type="checkbox"/> 2-ACETYLAMINO FLUORENE	<input type="checkbox"/> 4-DIMETHYLAMINOAZOBENZENE
<input type="checkbox"/> ACRYLONITRILE	<input type="checkbox"/> DIMETHYL SULFATE
<input type="checkbox"/> AFLATOXINS	<input type="checkbox"/> DIOXANE, TECHNICAL GRADE
<input type="checkbox"/> 4-AMINODIPHENYL	<input type="checkbox"/> ESTROGENS
<input type="checkbox"/> ARSENIC & COMPOUNDS	<input type="checkbox"/> HEPTACHLOR
<input type="checkbox"/> ARSENIC PENTOXIDE	<input type="checkbox"/> HEXACHLOROETHANE
<input type="checkbox"/> ARSINE	<input type="checkbox"/> KEPONE
<input type="checkbox"/> ASBESTOS	<input type="checkbox"/> MELPHALAN
<input type="checkbox"/> AURAMINE	<input type="checkbox"/> 4,4'-METHYLENE-BIS-(2-CHLORANILINE)
<input type="checkbox"/> AZATHIOPRINE	<input type="checkbox"/> MORPHOLINE
<input type="checkbox"/> BENZ(A)PYRENE	<input type="checkbox"/> MUSTARD GAS
<input type="checkbox"/> BENZENE	<input type="checkbox"/> MYLERAN
<input type="checkbox"/> BENZIDINE	<input type="checkbox"/> 2-NAPHTHYLAMINE
<input type="checkbox"/> BERYLLIUM	<input type="checkbox"/> NICKEL CARBONYL, AS NICKEL
<input type="checkbox"/> BERYLLIUM OXIDE	<input checked="" type="checkbox"/> NICKEL, METAL
<input type="checkbox"/> BERYLLIUM SULFATE	<input checked="" type="checkbox"/> NICKEL, SOLUBLE COMPOUNDS (AS NI)
<input type="checkbox"/> CHLOROAMBUCIL	<input type="checkbox"/> NICKEL SULFIDE
<input type="checkbox"/> CHLORDANE	<input type="checkbox"/> 4-NITROBIPHENYL
<input type="checkbox"/> CHLORINATED CAMPHENE	<input type="checkbox"/> NITROGEN MUSTARD
<input type="checkbox"/> CHLORNAPHTHAZINE	<input type="checkbox"/> N-NITROSODIMETHYLAMINE
<input type="checkbox"/> CHLOROBENZILATE	<input type="checkbox"/> OXYMETHOLONE
<input type="checkbox"/> CHLOROFORM	<input type="checkbox"/> PERCHLOROETHYLENE
<input type="checkbox"/> BIS-CHLOROMETHYL ETHER	<input type="checkbox"/> PHENACETIN
<input type="checkbox"/> CHLOROMETHYL METHYL ETHER	<input type="checkbox"/> POLYCYCLIC AROMATIC HYDROCARBONS
<input checked="" type="checkbox"/> CHROMIC ACID & CHROMATES	<input type="checkbox"/> 2-PROPIOLACTONE
<input type="checkbox"/> CHROMITE ORE PROCESSES(CHROMATE)	<input type="checkbox"/> 1,1,2,2-TETRACHLOROETHANE
<input checked="" type="checkbox"/> CHROMIUM, METAL	<input type="checkbox"/> THORIUM DIOXIDE
<input type="checkbox"/> COAL TAR PITCH VOLATILES	<input type="checkbox"/> O-TOLUIDINE
<input type="checkbox"/> COKE OVEN EMISSIONS	<input type="checkbox"/> TOXAPHENE
<input type="checkbox"/> CYCLOPHOSPHAMIDE	<input type="checkbox"/> TREOSULFAN
<input type="checkbox"/> DIBROMOCHLOROPROPANE	<input type="checkbox"/> 1,1,2-TRICHLOROETHANE
<input type="checkbox"/> 3,3'-DICHLOROENZIDINE	<input type="checkbox"/> TRICHLOROETHYLENE
<input type="checkbox"/> 1,2-DICHLOROETHANE	<input type="checkbox"/> 2,4,6-TRICHLOROPHENOL
<input type="checkbox"/> DIETHYLSTILBOESTRIOL	<input type="checkbox"/> VINYL CHLORIDE
<input type="checkbox"/> DIETHYL SULFATE	

(3B.) OTHER CHEMICALS USED (CHECK ALL THAT APPLY):

<input type="checkbox"/> BUTADIENE	<input type="checkbox"/> CADMIUM	<input type="checkbox"/> ETHYLENE OXIDE
<input type="checkbox"/> MERCURY	<input checked="" type="checkbox"/> LEAD	<input type="checkbox"/> NONE OF THE CHEMICALS LISTED ON THIS PAGE

DEP CODE: - - - -

DECEMBER 28, 1995

PAGE 3 OF 20

(4.) OTHER CT. LOCATIONS OPERATED BY THIS COMPANY:

DEP TOWN NO.: _____

COMPANY NAME: _____ CONTACT: _____

SITE ADDRESS: _____

NATURE OF OPERATION: _____

DEP TOWN NO.: _____

COMPANY NAME: _____ CONTACT: _____

SITE ADDRESS: _____

NATURE OF OPERATION: _____

POLLUTANT CONTROL SYSTEM INFORMATION:

COMPANY NAME: SUPERIOR PLATING CO
 (9.) BUILDING: MAIN PLANT 1

DEP REG	SOURCE DESCRIPTION	MAINTENANCE PROG (Y/N)	CONTROL SYSTEM DESCRIPTION				TOTAL EFFIC
DEP STK [1]	VENT I.D. [2]	FREQ (MO.) [3]	POLLUT	PRIMARY [4]	SECONDARY	TERTIARY	[5]
R 77 2	P-18 TANK 2 BLOWER	Y 3.0	TSP	CYCLONE	DEMISTOR		99.9
R 73 2	P-19 TANK 2 BLOWER	Y 3.0	TSP	CYCLONE	DEMISTOR		99.9
N 0 2	P-20 TANK 2 BLOWER	Y 3.0	TSP	CYCLONE	DEMISTOR		99.9
R 76 2	P-21 TANK 2 BLOWER	Y 3.0	TSP	CYCLONE	DEMISTOR		99.9
R 78 2	P-23 TANK 2 BLOWER	Y 3.0	TSP	CYCLONE	DEMISTOR		99.9
R 79 2	P-24 TANK 2 BLOWER	Y 3.0	TSP	CYCLONE	DEMISTOR		99.9
N 0 —	ZINCATE CYCLE EXHAUST 20	Y 6.0	H2O	DEMISTOR			—
N 0 —	NICKEL STRIP & CLEANER TANK 28	Y 6.0	H2O	DEMISTOR			—
R 87 —	ELECTROLESS NICKEL PLATING TKS 29	Y 6.0	H2O	DEMISTOR			99.9
N 0 —	BARREL STRIP TANK 3 BLOWER	Y 3.0	TSP	CYCLONE	DEMISTOR		99.9
R 91 3	P-31 TANK 3 BLOWER	Y 3.0	TSP	CYCLONE	DEMISTOR		99.9
R 92 3	P-32 TANK 3 BLOWER	Y 3.0	TSP	CYCLONE	DEMISTOR		99.9
R 90 3	P-33 TANK 3 BLOWER	Y 3.0	TSP	CYCLONE	DEMISTOR		99.9

POLLUTANT CONTROL SYSTEM INFORMATION:

COMPANY NAME: SUPERIOR PLATING CO
 (9.) BUILDING: MAIN PLANT 2

DEP REG	SOURCE DESCRIPTION	MAINTENANCE PROG (Y/N)	CONTROL SYSTEM DESCRIPTION				TOTAL EFFIC
DEP STK [1]	VENT I.D. [2]	FREQ (MO.) [3]	POLLUT	PRIMARY [4]	SECONDARY	TERTIARY	[5]
R 89 3	P-34 TANK 3 BLOWER	Y 3.0	TSP	CYCLONE	DEMISTOR		99.9
R 86 3	P-37 TANK 3 BLOWER	Y 3.0	TSP	CYCLONE	DEMISTOR		99.9
R 93 3	P-43 TANK 3 BLOWER	-	TSP	CYCLONE	DEMISTOR		
R 87 3	P-44 TANK 3 BLOWER	Y 3.0	TSP	CYCLONE	DEMISTOR		99.9
R 85 3	P-45 TANK 3 BLOWER	Y 3.0	TSP	CYCLONE	DEMISTOR		99.9
R 84 3	P-46 TANK 3 BLOWER	Y 3.0	TSP	CYCLONE	DEMISTOR		99.9
R 82 3	P-55 TANK 3 BLOWER	Y 3.0	TSP	CYCLONE	DEMISTOR		99.9
R 81 3	P-56 TANK 3 BLOWER	Y 3.0	TSP	CYCLONE	DEMISTOR		99.9
N 0 3	P-60 TANK 3 BLOWER	Y 3.0	TSP	CYCLONE	DEMISTOR		99.9
N 0 —	S-17, STRIP TANK 3 BLOWER	Y 3.0	TSP	CYCLONE	DEMISTOR		99.9
N 0 3	S-3, STRIP TANK 3 BLOWER	Y 3.0	TSP	CYCLONE	DEMISTOR		99.9
N 0 —	S-35, STRIP TANK 3 BLOWER	Y 3.0	TSP	CYCLONE	DEMISTOR		99.9



STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION



NOTICE OF VIOLATION

Charles Szaley
Superior Plating Co
Lacey Place
Southport, CT 06490

Notice of Violation Number
13618

The purpose of this Notice is to inform you that personnel of the Department of Environmental Protection (DEP) have made observations or otherwise obtained information indicating that a violation of law has occurred at the property located at Lacey Place, Southport, CT. On 12/1/97, DEP Bureau of Air Management received final test results for your company's chromium emission stack testing submitted by Air Tox Environmental Company. Based upon review of the final test results, it appears that you have exceeded the Maximum Allowable Stack Concentration (MASC) as derived from the hazard Limiting Value (HLV) listed in Table 29-1 Section 22a-174-29(b)(1) of the Regulations of Connecticut State Agencies and the Connecticut General Statutes Section 22a-174.

When you have corrected the violation(s) alleged in this notice, you should submit in writing the details of the corrective action(s). The submittal should be made within thirty (30) days on the enclosed Compliance Statement, and sent to the contact person identified below in paragraph D. Until the DEP has received such a statement, the DEP will presume you remain in violation. If the violation(s) cannot be corrected within 30 days, provide a schedule of compliance, that includes a timetable, on the enclosed Compliance Statement within 30 days describing the actions you will take to correct the violation(s). Your actions in response to this notice, including submission of the attached Compliance Statement, may affect the DEP's decision whether or not to take formal enforcement action.

A. Other violations may exist; legal obligations. This Notice does not necessarily specify all violations of Connecticut environmental law or violations of any other legal requirements which may exist at the aforementioned property. This Notice does not preclude the DEP or other state, local or federal agencies from commencing any enforcement action regarding any such violations. Your facility may be inspected again pursuant to law and without additional prior notice to determine compliance with state and any applicable federal law. It is your responsibility to comply with all legal requirements, whether or not the DEP notifies you of any violations or takes any enforcement action against you. Nothing in this Notice relieves you of other obligations under applicable federal, state and local law.

B. Enforcement action. Civil penalties of up to \$25,000 may be assessed for each day of each violation under section 22a-175 of the Connecticut General Statutes. Notwithstanding the issuance of this Notice, the DEP may seek such penalties and may issue an order, seek an injunction, or take other legal action under Chapters 439 and 446c of the Connecticut General Statutes.

C. No assurance by Commissioner. No provision of this Notice and no action or inaction by the Commissioner shall be construed to constitute an assurance by the Commissioner that actions you may take to address the violation(s) alleged herein will result in compliance.

D. Staff contact. If you question any of the information contained in this Notice, you may contact Robert LaFrance of the Bureau of Air Management at 424-3028, or by mail at 79 Elm Street, Fifth Floor, Hartford, CT 06106-5127.

1/16/98

Date

Certified No. 266 541 962

Michael Sullivan

Michael Sullivan, Director
Engineering and Enforcement



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
New England - Region 1
5 Post Office Sq., Suite 100
BOSTON, MA 02109-3912

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Docket No.: TSCA-NON-2018-003

JAN 30 2018

Roger Goulet, Renovator
P.O. Box 1019
Berwick ME, 03901

Re: **NOTICE OF NONCOMPLIANCE for Potential Violations of the Residential Property Renovation Requirements**

Dear Mr. Goulet:

The United States Environmental Protection Agency Region 1 - New England (EPA) is issuing this Notice of Noncompliance (NON) to you for potential violations of the Residential Property Renovation requirements codified at 40 C.F.R. § 745, Subpart E. The Residential Property Renovation requirements include the Renovation, Repair and Painting (RRP) Rule, which became effective on April 22, 2010.

Among other things, the RRP Rule requirements aim to prevent lead-based paint (LBP) hazards created by renovation, repair, and painting activities that disturb LBP in pre-1978 target housing and child-occupied facilities. The regulations require contractors, property owners, managers, and others who perform repairs and renovations of target housing for compensation that disturb more than six square feet of interior or 20 square feet of exterior painted surface (even if it is not known whether the paint contains lead) to:

- provide the property owners and occupants with the EPA pamphlet entitled "Renovate Right" before repair/renovation starts;
- obtain confirmation of receipt of lead pamphlet from the owner and occupants or a certificate of mailing from the post-office;
- for work in common areas of multi-family housing, provide written notice describing the planned repair/renovation to each affected unit;
- ensure that renovators, contractors, and dust sampling technicians are properly trained;
- obtain proper firm certification;

- use lead safe renovation practices; and
- keep required records for at least three years.

There are also special notification requirements in child-occupied facilities, such as day care centers and pre-schools.

A contractor, property owner, manager, or other renovator who has failed to comply with the RRP requirements has committed a prohibited act under TSCA Section 409 (15 U.S.C. §2689), and is liable for civil penalties under TSCA Section 16 (16 U.S.C. §2615).

Management/Ownership and Inspection History

Your business involves performing painting and carpentry services. Some of the maintenance includes performing renovations, repair and painting work covered by the EPA's RRP rule. At the time of the EPA inspection on October 17, 2017, you had been self-employed and had been performing renovations, painting and/or other repairs to target properties, including 207 Dover Point Road in Dover, New Hampshire.

At the time of this EPA inspection, EPA informed you of potential deficiencies with compliance with the EPA's RRP Rule. This rule applies to landlords, property management companies and contractors who own, rent, sell, renovate, repair and paint pre-1978 target housing. Your compliance with this law and these regulations is required by federal law.

Potential Violations:

Based on observations made by EPA Inspectors Jordan Alves and James Valentine, along with a review of paperwork that you provided to them during the EPA inspection on October 17, 2017, EPA has determined the following potential violations occurred regarding the renovations made to the subject property at 207 Dover Point Road in Dover, New Hampshire.

1. Failure to provide owners and/or adult occupants with an EPA-approved lead hazard information pamphlet ("*Renovate Right*") and obtain acknowledgements of receipt.
 - **Provision Violated: 40 C.F.R. §745.84.**
2. Failure to ensure a certified renovator is assigned to all renovations performed by the firm and that work is performed in accordance with the work practice standards in §745.85. For instance, according to 40 C.F.R. §745.85(a)(2)(ii)(C), for exterior renovations, "renovators must cover the ground with plastic sheeting or other disposable impermeable material extending 10 feet beyond the perimeter of surfaces undergoing renovation or sufficient distance to collect falling paint debris, whichever is greater;" for interior renovations, among other things, renovators must "cover the floor surface, including installed carpet, with taped-down plastic sheeting... in the work areas 6 feet beyond the perimeter of surfaces undergoing renovation...". According to 40 C.F.R. §745.85(a)(4)(i), "Waste from renovation activities must be contained to prevent releases of dust and debris before the waste is removed from the work area for storage and disposal."
 - **Provisions Violated: 40 C.F.R. §§745.85(a)(2)(i) and (ii); and (a)(4)(i).**

3. Failure to retain and if requested make available to EPA, all records necessary to demonstrate compliance for a period of 3 years. The following records were not available for the inspectors during the EPA inspection: no copies of signed acknowledgments for receiving the "Renovate Right" pamphlets prior to RRP work commencing; no records showing that the required post-renovation cleaning was performed at the end of the RRP jobs; and no proof of lead test kit results are being documented.

- **Provisions Violated: 40 C.F.R. §§745.86(a); (b)(2); (b)(6); (b)(6)(ii); and (b)(6)(v)(G)(vii)(B).**

4. Failure to obtain RRP Firm Certification according to 40 C.F.R §745.89(a), all firms that perform renovations for compensation must apply to EPA for certification to perform renovations. The certified RRP firm performing the renovations must ensure: that all individuals performing renovations on behalf of the firm are either certified renovators or have been trained by a certified renovator in accordance with §745.90; that all renovations performed by the firm are performed in accordance with the work practice standards in §745.85; that the pre-renovation education/notification requirements of §745.84 have been performed and that the recordkeeping requirements of §745.86 are met.

- **Provisions Violated: 40 C.F.R. §§745.89(a) and (d)(1)(2)(3)(4) and (5).**

Compliance with the Renovation, Repair, and Paint Program Requirements

When conducting applicable repairs and renovations for compensation (including rent) in target housing or child-occupied facilities:

- Owners/adult occupants must be notified and provided with a EPA lead hazard information pamphlet ("*Renovate Right*") before starting repair/renovations that will disturb more than six square feet of interior or 20 square feet of exterior painted surface in occupied target housing;
- All work must be performed in a lead-safe manner consistent with the RRP Rule;
- A system must be in place to document compliance - see EPA's "Small Entity Compliance Guide to Renovate Right: EPA's Lead Based Paint Renovation, Repair, and Painting Program" in the enclosed Compliance Assistance package;
- Required post-renovation cleaning verification can be documented on the "RRP Checklist" found on page 27 of the above mention EPA small entity guide; and
- Records required by the RRP rule requirements must be retained for three years.

While you are receiving a NON for these alleged violations at this time, any further violation(s) of the RRP Rule requirements by you may result in the issuance of a Civil Administrative Complaint for the assessment of penalties. Violations occurring after the time that you were inspected may be assessed a higher penalty, based on a potentially higher degree of culpability for such violations.

In order to follow-up on remaining issues from our inspection, you are hereby requested to:

Within 30 days of your receipt of this NON, please review, sign and date the attached "***Affidavit Certifying Compliance***" form, and send it back to EPA along with the following documentation:

1. Copies of any new RRP you are properly certified to perform RRP work; and
2. A copy of your company's application for RRP firm certification and/or a copy of your company's current RRP Firm certificate.

Mailing directions are printed on the *Affidavit* attached to this letter (see next page).

The Purpose of This NON

The primary purpose of this letter is to identify problem areas and seek improved compliance. This NON does not limit or otherwise preclude EPA from taking civil or criminal enforcement action pursuant to Section 16 of the Toxics Substance Control Act, 15 U.S.C. § 2615.

I urge you to take necessary steps to address the above-cited potential violations. If you have any questions regarding this letter or how to comply with the EPA's Lead Laws and Regulations, please contact Jordan Alves of my staff at (617) 918-1739.

For your convenience, a Compliance Assistance package, containing information about the EPA's Lead Rules and requirements is contained in this package.

Sincerely,



Sharon Hayes, Manager
Technical Enforcement Office
Office of Environmental Stewardship
US EPA-New England

Enclosures: -EPA's "***Affidavit Certifying Compliance***" form (**to be completed and returned to EPA**)
-Compliance Assistance package

cc: Ross Malcolm, New Hampshire Department of Health and Human Services

BEFORE THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
NEW ENGLAND
Boston, Massachusetts

In The Matter of: Roger Goulet; Docket No. TSCA-NON-2018-003.

NOTICE OF NONCOMPLIANCE with the Renovation, Repair, and Paint (RRP) Rule

Issued to:

Roger Goulet, Renovator
P.O. Box 1019
Berwick ME, 03901

AFFIDAVIT CERTIFYING COMPLIANCE

By signing this Affidavit, I acknowledge receipt of an EPA Notice of Noncompliance disclosing an EPA finding of potential violations and, further, indicate my intention to address such alleged violations, as indicated in the Notice of Noncompliance.

I certify under penalty of law that I have personally examined and am familiar with the information submitted pursuant to this request; that, to the best of my knowledge and belief, the submitted information is true, accurate and complete; and that all documents submitted are complete and authentic, unless otherwise indicated.

I certify that I am fully complying with the RRP Rules. The pages accompanying this Affidavit demonstrate my full compliance.

Additional Comments:

Date: _____ Signature: _____

Print name: _____ Office or Title: _____

***Within 30 days of Receipt of this Notice, please mail the original copy of this signed "Affidavit" form and any copies of the requested documentation to:**

Jordan Alves
U.S. EPA - New England (OES 5-04)
5 Post Office Square
Boston, MA 02109-3912